

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JACQUES RIVERA,)	
)	
<i>Plaintiff,</i>)	No. 12 C 4428
)	
<i>v.</i>)	Hon. Joan B. Gottschall,
)	District Judge
)	
REYNALDO GUEVARA, <i>et al.</i> ,)	Hon. Mary M. Rowland,
)	Magistrate Judge
<i>Defendants.</i>)	
)	

**PLAINTIFF'S RESPONSE TO DEFENDANTS'
MOTION FOR LEAVE TO FILE EXCESS PAGES**

Plaintiff, JACQUES RIVERA, by his attorneys, respectfully submits this response to Defendants' Motion for Leave to File Excess Pages (Doc. No. 702), stating in support as follows:

1. Defendants' post-trial motions are due August 31, 2018.
2. On August 27, 2018, Defendants filed a motion requesting leave to file post-trial motions from the City of 50 pages and separate post-trial motions from the individual Defendants of 60 pages. To be clear, Defendants are asking for 110 pages of combined post-trial briefing.
3. In Plaintiff's view, this number of pages requested is abusive and excessive. Unless Defendants intend to take issue with every single objection they lost at trial, no party needs that many pages for a post-trial motion.
4. The Seventh Circuit limits appeal briefs to 14,000 words, and it has stressed repeatedly that parties must make editorial decisions in order not to

burden courts with verbose briefs outlining every imaginable argument. *See, e.g., Fleming v. County of Kane*, 855 F.2d 496, 497 (7th Cir. 1988) (“Page limitations are important, not merely to regulate the Court’s workload, but also to encourage litigants to hone their arguments and to eliminate excessive verbiage.”); *see also United States v. Torres*, 170 F.3d 749, 751 (7th Cir. 1999); *United States v. Devine*, 768 F.2d 210, 211 (7th Cir. 1985) (*en banc*).

5. If Defendants’ motion was granted, both the Court and Plaintiff (who will have to devote far more space in response to every argument raised in passing in 110 pages of briefing) will be unfairly impacted by Defendants’ refusal to exercise better editorial discretion.

6. Plaintiff therefore urges the Court to direct the Defendants to combine their post-trial motions, collectively, into a brief of no more than 40 pages.

RESPECTFULLY SUBMITTED,

JACQUES RIVERA

By: /s/ Jon Loevy
One of Plaintiff’s Attorneys

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CERTIFICATE OF SERVICE

I, Jon Loevy, an attorney, hereby certify that on August 27, 2018, I filed the foregoing via the Court's CM/ECF system and thereby served a copy on all counsel of record.

/s/ Jon Loevy
One of Plaintiff's Attorneys